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September 14, 2016

*By Electronic Filing*

Honorable Freda L. Wolfson, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Federal Building & US Courthouse  
402 E. State Street  
Trenton, NJ 08608

Re: Avraham D. Schwarzmer v. Citibank, N.A., et al.  
Civil Action No. 3:16-cv-5169-FLW-LHG

Dear Judge Wolfson:

I represent defendants in the above-referenced matter.

I am writing to request an extension of the time within which defendants must answer, move, or otherwise respond to the Complaint, up to and including October 14, 2016. Defendants require this extension in order to fully investigate plaintiff's allegations, and prepare their response thereto. Plaintiff's counsel has graciously consented to this request being granted.

Enclosed with this letter is a proposed consent order, signed by respective counsel for the parties, memorializing the requested extension to October 14<sup>th</sup>. Assuming it meets with Your Honor's approval, I ask that you sign where indicated and arrange for its entry on the docket.

Thank you for your consideration of this request.

Respectfully,

A handwritten signature in black ink, appearing to be "CT", written over a horizontal line.

Christopher N. Tomlin

CNT/jam  
Enclosure

cc: Edward B. Geller, Esq. (w/enclosure, By Electronic Filing)

DMEAST #27048621 v1

A PA Limited Liability Partnership | John B. Kearney, Managing Partner

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